

EXHIBIT CK

FILED UNDER SEAL

Ex. C –Infringement Contention Chart: U.S. Patent No. 10,469,966
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY

Claim 1	Accused Instrumentalities
<p>[1.0] A computing device comprising:</p>	<p>Google’s “Cast” technology enables Cast-enabled media players to be included in a “speaker group” “for synchronous music throughout the home.”¹ These Cast-enabled media players include Google’s own Cast-enabled media players, such as the Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Wifi Point, Chromecast, Chromecast Audio, Chromecast Ultra, Chromecast with Google TV, and Nest Audio media players, as well as various other third-party media players with built-in Cast functionality. <i>See, e.g.,</i> https://store.google.com/us/product/google_home_max?hl=en-US; https://store.google.com/us/product/chromecast_google_tv_compare?hl=en-US; https://www.google.com/chromecast/built-in/audio/.</p> <p>To facilitate this functionality, the Google Home app allows a user to “[c]reate and manage speaker groups” from the user’s smartphone, tablet, or computer device, as well as to “cast” to a previously-created “speaker group” from the user’s smartphone, tablet, or computer device, which causes the “speaker group” to be invoked. https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en. In addition, there are many other Cast-enabled Android, iOS, Chrome, or browser-based apps that allow a user to “cast” to a previously-created “speaker group” (and thereby cause the “speaker group” to be launched) using the user’s smartphone, tablet, or computer device, including certain of Google’s own Cast-enabled apps (e.g., YouTube Music app, the Google Play Music app, the Google Podcasts app, etc.) as well as certain third-party Cast-enabled apps (e.g., the Spotify app), accessed via an app store or Chromecast-enabled site URL. The Google Home app, either alone or together with one or more of these other Cast-enabled apps, can be installed and run on any smartphone, tablet, or computer device that supports Android, iOS, Chrome apps, or browser-based apps, including Google’s own “Pixel” smartphone, tablet, and computer devices (e.g., the Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL, Pixel 4a, Pixel 4a (5G), Pixel 5, Pixel 5a (5G), Pixel 6 phones, the Pixel Slate tablet, and the Pixelbook and Pixelbook Go laptops) as well as many third-party smartphone, tablet, or computer devices. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel; https://store.google.com/us/product/google_pixelbook_specs; https://store.google.com/us/product/pixel_slate_specs. For purposes of this chart, any smartphone, tablet, or computer device installed with the Google Home app, either alone or together with one or more of these other Cast-enabled apps, will be referred to as a “Cast-enabled computing device.”</p>

¹ Additional information regarding the accused instrumentalities is set forth in the Infringement Contention Chart for U.S. Patent No. 10,848,885 (Ex. D), which is incorporated herein by reference.

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	<p>As set out in the Supplemental Infringement Contentions, Sonos has endeavored to list the possible third-party smartphone, tablet, and computer devices that may have been used to download and install the Google Home app between November 2019 to present. <i>See</i> Appx. 1. Each of these third-party smartphone, tablet, and computer devices, when installed with the Google Home app, meets all elements of the claims as explained in more detail herein. As set forth below, Sonos cites representative examples of Google smartphone, tablet, and computer devices meeting elements 1.1, 1.2, and 1.3, but notes that the hardware aspects recited in elements 1.1, 1.2, and 1.3 have become ubiquitous among all smartphone, tablet, and computer devices. Each possible third-party smartphone, tablet, and computer device listed in Appendix 1 contains these aspects and thus meets elements 1.1, 1.2, and 1.3.</p> <p>Certain of the aforementioned Cast-enabled media players also include a display screen and software that enables these Cast-enabled media players to additionally function as a control device for other Cast-enabled media players. This sub-category of Cast-enabled media players, which will be referred to herein as “Cast-enabled displays,” includes Google’s Home Hub, Nest Hub, and Nest Hub Max media players. <i>See, e.g.,</i> https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music; https://store.google.com/us/product/google_nest_hub_max?hl=en-US; https://support.google.com/googlenest/answer/9165738?hl=en-GB&ref_topic=7030084. Similar to the Cast-enabled apps installed on the Cast-enabled computing devices, the software installed on these Cast-enabled displays allows a user to “cast” to a previously-created “speaker group” using the Cast-enabled display’s user interface.</p> <p>As described in further detail below, each Cast-enabled computing device comprises a “computing device” as recited in claim 1. Further, because each Cast-enabled media player is a data network device (<i>i.e.</i>, a device that is configured to connect to and communicate over a medium that interconnects devices in a manner that enables them to send digital data packets to and receive digital data packets from each other) and is configured to process and output audio, each Cast-enabled media player comprises a “zone player” as recited in claim 1. <i>See, e.g.,</i> Pl.’s Opening Markman Br. (D.I. 60 of 20-cv-881-ADA) at pp. 4-6, 23-26, Exs. 24-25; Pl.’s Reply Markman Br. (D.I. 66 of 20-cv-881-ADA) at pp. 2-3, 10-12, Exs. 26-27; SONOS-SVG2-00018184 - SONOS-SVG2-00018236 [ITC Order No. 20] at p. 15; https://support.google.com/googlenest/answer/7072284?hl=en; https://support.google.com/chromecast/answer/3046409?hl=en; https://store.google.com/us/product/nest_wifi_specs?hl=en-US.</p>

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[1.1] one or more processors;	Each Cast-enabled computing device comprises one or more processors. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel ; https://store.google.com/us/product/google_pixelbook_specs ; https://store.google.com/us/product/pixel_slate_specs .
[1.2] a non-transitory computer-readable medium;	Each Cast-enabled computing device comprises a non-transitory computer-readable medium. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel ; https://store.google.com/us/product/google_pixelbook_specs ; https://store.google.com/us/product/pixel_slate_specs .
[1.3] and program instructions stored on the non-transitory computer-readable medium that, when executed by the one or more processors, cause the computing device to perform functions comprising:	Each Cast-enabled computing device comprises program instructions stored on the non-transitory computer-readable medium that, when executed by the Cast-enabled computing device's one or more processors, cause the Cast-enabled computing device to perform the functions identified below. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel ; https://store.google.com/us/product/google_pixelbook_specs ; https://store.google.com/us/product/pixel_slate_specs .
[1.4] while serving as a controller for a networked media playback system comprising a first zone player and at least two other zone players, wherein the first zone player is operating in a standalone mode in	Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device's non-transitory computer-readable medium that, when executed by the Cast-enabled computing device's one or more processors, cause the Cast-enabled computing device to, while serving as a controller for a Cast-enabled playback system comprising a first Cast-enabled media player and at least two other Cast-enabled media players, where the first Cast-enabled media player is operating in a standalone mode in which the first Cast-enabled media player is configured to play back media individually, perform the functions identified below. For instance, each Cast-enabled computing device is programmed with the capability to serve as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, where at least the first Cast-enabled media player is operating in a standalone mode in

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<p>which the first zone player is configured to play back media individually:</p>	<p>which the first Cast-enabled media player is configured to play back audio individually rather than a group mode in which the first Cast-enabled media player is configured to play back audio as part of a group of Cast-enabled media players. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/chromecast/answer/6178107?co=GENIE.Platform%3Dandroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3Dandroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3Ddesktop&oco=1.</p>
<p>[1.5] receiving a first request to create a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked;</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to receive a first request to create a first zone scene comprising a first predefined grouping of Cast-enabled media players including at least the first Cast-enabled media player and a second Cast-enabled media player that are to be configured for synchronous playback of media when the first zone scene is invoked.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while serving as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, the Cast-enabled computing device is operable to receive a request from a user to create a first “speaker group” that includes the first Cast-enabled media player and a second Cast-enabled media player in the Cast-enabled playback system that are to be configured for synchronous playback of audio when the first “speaker group” is invoked. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups” for “synchronous music throughout the home”). Thus, this first “speaker group” that a user seeks to create with this first request amounts to the claimed “first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked” because it is a previously-saved group of Cast-enabled players that has been predefined to include the first Cast-enabled media player and a second Cast-enabled media player and that is capable of existing in two states – an uninvoked state in which each Cast-enabled player in the previously-saved group is configured for individual playback of audio and an invoked state in which the Cast-enabled players in the previously-saved group are configured for synchronous playback of audio. <i>Id.</i></p>

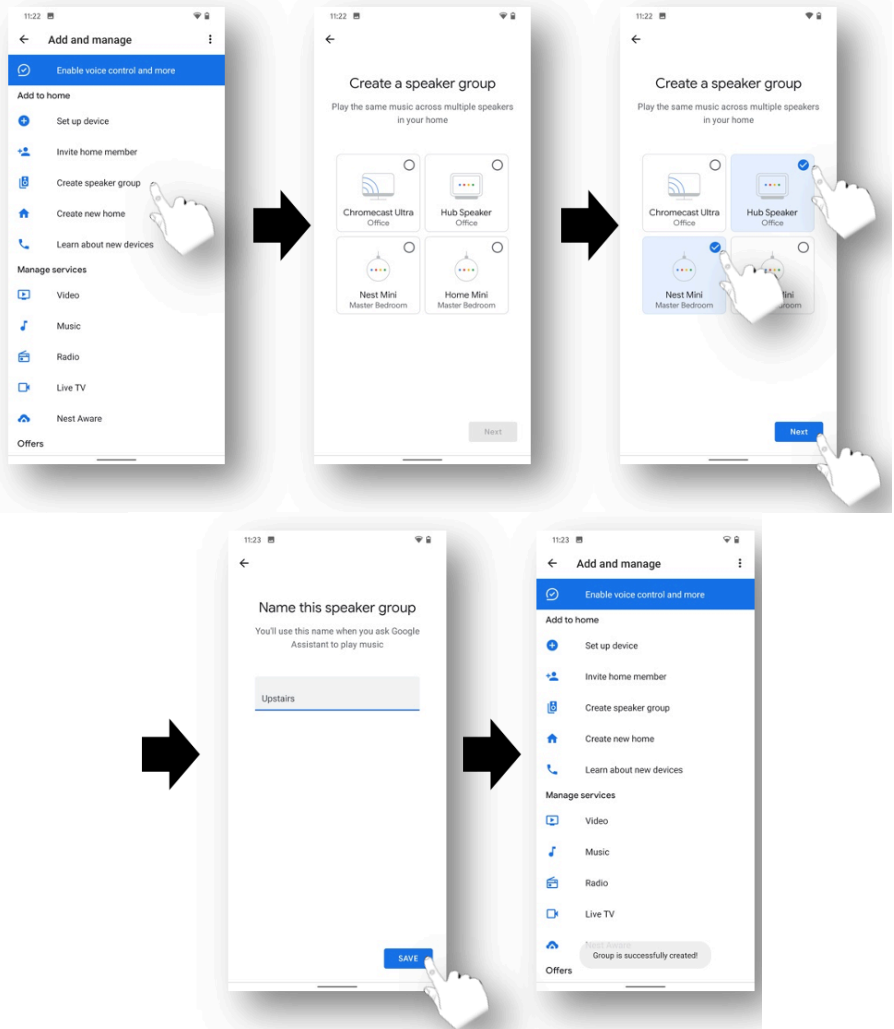
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	<p>Moreover, even if the Court were to construe the term “zone scene” to mean “a previously-saved group of zone players <i>according to a common theme</i>,” as Judge Alan Albright suggested during the Markman hearing in 20-cv-881-ADA (<i>see</i> D.I. 106 at 38:1-3), this first “speaker group” that a user seeks to create with this first request amounts to a first “zone scene” under that construction. Indeed, every “speaker group” that a user seeks to create in a Cast-enabled playback system is a previously-saved, predefined group of Cast-enabled players that is capable of existing in two states – an uninvoked state in which each Cast-enabled player in the previously-saved group is configured for individual playback of audio and an invoked state in which the Cast-enabled players in the previously-saved group are configured for synchronous playback of audio. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups” for “synchronous music throughout the home”). Further, every “speaker group” that a user seeks to create in a Cast-enabled playback system has some common theme, which in this context amounts to whatever common topic, subject, etc. led the user to decide that these particular Cast-enabled media players should be placed into a previously-saved group that allows for synchronous playback when invoked. <i>Id.; see also, e.g.,</i> ‘966 Patent at 2:38-45 (“According to one aspect of the present invention, a mechanism is provided to allow a user to group some of the players according to a theme or scene, where each of the players is located in a zone. When the scene is activated, the players in the scene react in a synchronized manner. For example, the players in the scene are all caused to play an audio source or music in a playlist, wherein the audio source may be located anywhere on a network.”), 3:52-56 (“FIG. 3A provides an illustration of one zone scene, where the left column shows the starting zone grouping—all zones are separate, the column on the right shows the effects of grouping the zones to make a group of 3 zones named after ‘Morning’”); 8:57-61 (same); 10:37-42 (“The process 600 then moves to 604 where it allows a user to decide which zone players to be associated with the scene. For example, there are ten players in a household, and the scene is named after ‘Morning’. The user may be given an interface to select four of the ten players to be associated with the scene.”), FIG. 5A; D.I. 106 [Markman Hr. Tr.] at 30:24-31:5 (Google’s counsel arguing “the theme would be, for example, grouping three areas as a morning scene or a morning theme because you get up in the morning and these are the three areas you want to have music in. You could do the same thing -- and the patent provides examples -- for other types of zone scenes for different times of day or different types of events”); American Heritage Dictionary of the English Language, Fifth Edition (2011), <i>available at</i> https://www.thefreedictionary.com/theme (defining “theme” as “[a] topic of discourse or discussion.”); Collins English Dictionary – Complete and Unabridged, 12th Edition (2014), <i>available at</i>, https://www.thefreedictionary.com/theme (defining “theme” as “an idea or topic expanded in a discourse,</p>

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	<p>discussion, etc”); https://www.learnersdictionary.com/definition/theme (defining “theme” as “the particular subject or idea on which the style of something (such as a party or room) is based”); https://dictionary.cambridge.org/us/dictionary/english/theme (defining “theme” as “the main subject of a talk, book, movie, etc.”). Typically, this common theme will be a specific area (or set of areas) within the user’s listening environment in which the user desires to listen to audio in synchrony across multiple Cast-enabled media players, although Google’s “Cast” technology provides a user with the flexibility to create a previously-saved group of Cast-enabled media players according to any common topic or subject that is of interest to the user. As part of the user workflow for creating a “speaker group,” a Cast-enabled computing device also prompts the user to input a name for the “speaker group,” which serves as the user’s shorthand label of the common theme that led to the user’s request to create the previously-saved group of Cast-enabled media players and thereby allows the user to locate and select that previously-saved group later when the user wishes to invoke it for synchronous playback. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing receiving a request from a user to create a first “speaker group” that includes the “Nest Mini” as the first zone player and “Hub Speaker” as the second zone player:</p>

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	 <p>As shown in these screenshots, the user has assigned this “speaker group” a name of “Upstairs,” which serves as the user’s shorthand label for the common theme that led to the user’s request to create this previously-saved group of Cast-enabled media players – namely, that the “Nest Mini” and “Hub Speaker” players are both</p>

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	<p>located in an area (or set of areas) within the user's listening environment that the user considers to be the upstairs of the listening environment and the user has a desire to listen to audio in synchrony across those specific Cast-enabled media players at some point in the future.</p> <p>Representative excerpts of Google's source code related² to the aforementioned functionality include:</p> <div style="background-color: black; width: 100%; height: 100%; min-height: 300px;"></div>

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Claim 1	Accused Instrumentalities
	<p align="center">○ [REDACTED]</p> <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p>
<p>[1.6] based on the first request, i) causing creation of the first zone scene, ii) causing an indication of the first zone scene to be transmitted to the first zone player, and iii) causing storage of the first zone scene;</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to, based on the first request, (i) cause creation of the first zone scene, (ii) cause an indication of the first zone scene to be transmitted to the first Cast-enabled media player, and (iii) cause storage of the first zone scene.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while serving as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, the Cast-enabled computing device is operable to receive a request from a user to create a first “speaker group” including the first Cast-enabled media player and a second Cast-enabled media player in the Cast-enabled playback system, and then based on the request, the Cast-enabled computing device generates data that defines the first “speaker group” [REDACTED] to each of the first and second Cast-enabled media players, which causes each of the first and second Cast-enabled media players to store data defining the first “speaker group” (e.g., [REDACTED]).</p> <p>Thus, based on the request, the Cast-enabled computing device (i) causes creation of the first “speaker group,” (ii) causes an indication of the first “speaker group” to be transmitted to the first Cast-enabled media player, and (iii) causes storage of the first “speaker group.” <i>See e.g.</i>, https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups”); GOOG-SONOSWDTX-00048962 [REDACTED], at 62:</p>

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	<div data-bbox="627 240 1749 792" style="background-color: black; width: 100%; height: 340px; margin-bottom: 10px;"></div> <p data-bbox="489 808 1877 889">GOOG-SONOSWDTX-00044046 [REDACTED]</p> <p data-bbox="489 922 1808 992">This first “speaker group” amounts to the claimed first “zone scene” for the reasons explained above in connection with limitation 1.5.</p> <p data-bbox="489 1029 1896 1138">Representative excerpts of Google’s source code³ related to the aforementioned functionality, from the perspective of a Cast-enabled computing device, include the source code cited above in connection with claim limitation 1.5 as well as:</p> <table border="1" data-bbox="489 1175 1906 1325"> <tr> <td data-bbox="489 1175 1476 1216" rowspan="4" style="background-color: black;"></td><td data-bbox="1476 1175 1906 1216"></td></tr> <tr> <td data-bbox="1430 1216 1906 1256"></td></tr> <tr> <td data-bbox="1367 1256 1906 1297"></td></tr> <tr> <td data-bbox="1367 1297 1906 1325"></td></tr> </table>					

³ [REDACTED]

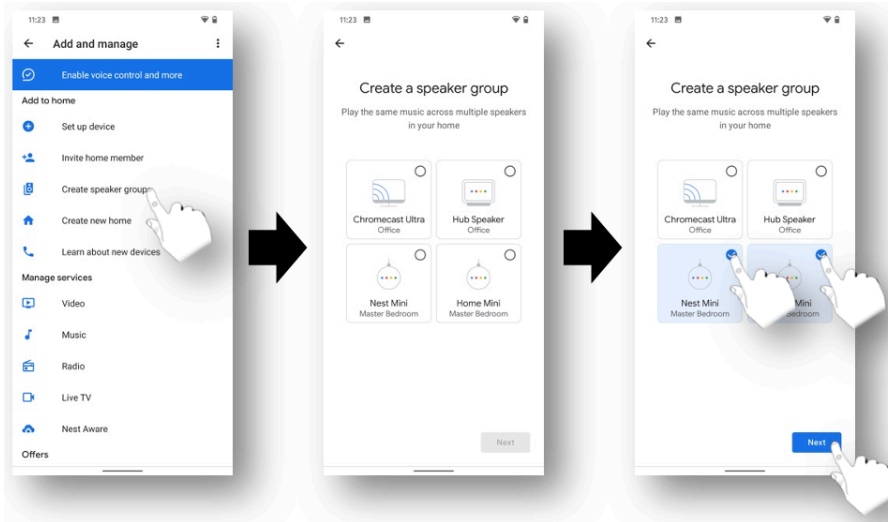
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	<div data-bbox="493 235 1911 272" style="background-color: black; height: 23px; width: 675px; margin-bottom: 10px;"></div> <ul style="list-style-type: none"> <div data-bbox="535 308 1879 613" style="background-color: black; height: 188px; width: 640px; margin-bottom: 10px;"></div> <div data-bbox="535 609 1528 841" style="background-color: black; height: 143px; width: 473px;"></div> <p data-bbox="493 868 1795 941">Representative excerpts of Google’s source code related to the aforementioned functionality, from the perspective of a Cast-enabled media player, include:</p> <div data-bbox="493 977 1911 1247" style="background-color: black; height: 166px; width: 675px; margin-bottom: 10px;"></div> <ul style="list-style-type: none"> <div data-bbox="535 1282 1890 1437" style="background-color: black; height: 95px; width: 645px;"></div>

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	 <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p>
<p>[1.7] receiving a second request to create a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the third zone player is different than the second zone player;</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to receive a second request to create a second zone scene comprising a second predefined grouping of Cast-enabled media players including at least the first Cast-enabled media player and a third Cast-enabled media player that are to be configured for synchronous playback of media when the second zone scene is invoked, where the third Cast-enabled media player is different than the second Cast-enabled media player.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while serving as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, the Cast-enabled computing device is configured to receive a request from a user to create a second “speaker group” that includes the first Cast-enabled media player and a third Cast-enabled media player in the Cast-enabled playback system that are to be configured for synchronous playback of audio when the second “speaker group” is invoked. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups” for “synchronous music throughout the home”); claim limitation 1.5. Thus, this second “speaker group” that a user seeks to create with this second request amounts to the claimed “second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked” because it is a previously-saved group of Cast-enabled players that has been predefined to include the first Cast-enabled media player and a third Cast-enabled media player and that is</p>

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	<p>capable of existing in two states – an uninvoked state in which each Cast-enabled player in the previously-saved group is configured for individual playback of audio and an invoked state in which the Cast-enabled players in the previously-saved group are configured for synchronous playback of audio. <i>Id.</i></p> <p>Moreover, even if the Court were to construe the term “zone scene” to mean “a previously-saved group of zone players <i>according to a common theme</i>,” as Judge Alan Albright suggested during the Markman hearing in 20-cv-881-ADA (<i>see</i> D.I. 106 at 38:1-3), this second “speaker group” that a user seeks to create with this second request amounts to a second “zone scene” under that construction for the same reasons explained above in connection with limitation 1.5.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing receiving a request from a user to create a second “speaker group” that includes the “Nest Mini” as the first zone player and “Home Mini” as the third zone player:</p> 

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	<div data-bbox="900 240 1507 748" data-label="Image"> </div> <p>As shown in these screenshots, the user has assigned this “speaker group” a name of “Party,” which serves as the user’s shorthand label for the common theme that led to the user’s request to create this previously-saved group of Cast-enabled media players – namely, that the “Nest Mini” and “Home Mini” players are located in an area (or set of areas) within the user’s listening environment that the user associates with having a party and the user has a desire to listen to audio in synchrony across those specific Cast-enabled media players at some point in the future.</p> <p>Representative excerpts of Google’s source code related to the aforementioned functionality include the source code cited above in connection with claim limitation 1.5.</p> <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p>
[1.8] based on the second request, i) causing creation of the second zone	Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to, based on the second request, (i)

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<p>scene, ii) causing an indication of the second zone scene to be transmitted to the first zone player, and iii) causing storage of the second zone scene;</p>	<p>cause creation of the second zone scene, (ii) cause an indication of the second zone scene to be transmitted to the first Cast-enabled media player, and (iii) cause storage of the second zone scene.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while serving as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, the Cast-enabled computing device is operable to receive a request from a user to create a second “speaker group” including the first Cast-enabled media player and a third Cast-enabled media player in the Cast-enabled playback system, and then based on the request, the Cast-enabled computing device generates data that defines the second “speaker group” [REDACTED] which causes each of the first and third Cast-enabled media players to store data defining the second “speaker group” [REDACTED]. Thus, based on the request, the Cast-enabled computing device (i) causes creation of the second “speaker group,” (ii) causes an indication of the second “speaker group” to be transmitted to the first Cast-enabled media player, and (iii) causes storage of the second “speaker group.” <i>See e.g.</i>, https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups”); claim limitation 1.6.</p> <p>This second “speaker group” amounts to the claimed second “zone scene” for the reasons explained above in connection with limitation 1.7.</p> <p>Representative excerpts of Google’s source code related to the aforementioned functionality include the source code cited above in connection with claim limitation 1.6.</p> <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p>
<p>[1.9] displaying a representation of the first zone scene and a representation</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to display a representation of the first zone scene and a representation of the second zone scene.</p>

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Claim 1	Accused Instrumentalities
of the second zone scene; and	<p>For instance, each Cast-enabled computing device is programmed such that, while serving as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, the Cast-enabled computing device is operable to display (i) a representation of a first “speaker group” (which is the claimed “first zone scene”) including the first Cast-enabled media player and a second Cast-enabled media player in the Cast-enabled playback system, and (ii) a representation of a second “speaker group” (which is the claimed “second zone scene”) including the first Cast-enabled media player and a third Cast-enabled media player. <i>See, e.g.,</i></p> <p>https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/chromecast/answer/6178107?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing device displaying a graphical user interface (GUI) of the Google Home app that comprises (i) a representation of a first “speaker group” named “Upstairs” that includes the “Nest Mini” and “Hub Speaker” players (which is the claimed “first zone scene” that includes the “first zone player” and “second zone player”), and (ii) a representation of a second “speaker group” named “Party” that includes the “Nest Mini” and “Home Mini” players (which is the claimed “second zone scene” that includes the “first zone player” and “third zone player”):</p>

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Claim 1	Accused Instrumentalities
	<div data-bbox="911 240 1499 748"> </div> <p>Another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s YouTube Music app, which show the Cast-enabled computing device displaying a GUI of the YouTube Music app that comprises (i) a representation of a first “speaker group” named “Upstairs” (which is the claimed “first zone scene”), and (ii) a representation of a second “speaker group” named “Party” (which is claimed “second zone scene”):</p>

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Claim 1	Accused Instrumentalities
	<div data-bbox="1081 235 1333 747"> </div> <p data-bbox="489 784 1917 1003">Yet another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s Google Play Music app, which show the Cast-enabled computing device displaying a GUI of the Google Play Music app that comprises (i) a representation of a first “speaker group” named “Upstairs” (which is the claimed “first zone scene”), and (ii) a representation of a second “speaker group” named “Party” (which is claimed “second zone scene”):</p>

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Claim 1	Accused Instrumentalities
	<div data-bbox="1087 240 1331 748" data-label="Image"> </div> <p data-bbox="491 784 1814 820">Various other Cast-enabled apps (e.g., Google Podcasts and Spotify apps) provide similar functionality.</p> <p data-bbox="491 857 1839 927">Representative excerpts of Google's source code for the Google Home app⁴ related to the aforementioned functionality include:</p> <div data-bbox="491 964 1908 1312" data-label="Text"> <p>[REDACTED]</p> </div>

⁴ [REDACTED]

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Claim 1	Accused Instrumentalities
	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 13, including any of Google's documents or source code cited therein. See Defendant's Objections & Responses to Plaintiff's First Set of Fact Discovery Interrogatories to Defendants.</p>
[1.10] while displaying the representation of	Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device's non-transitory computer-readable medium that, when executed by the Cast-enabled computing device's one or more processors, cause the Cast-enabled computing device to, while displaying the

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Claim 1	Accused Instrumentalities
<p>the first zone scene and the representation of the second zone scene, receiving a third request to invoke the first zone scene; and</p>	<p>representation of the first zone scene and the representation of the second zone scene, receive a third request to invoke the first zone scene.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while displaying (i) a representation of a first “speaker group” including the first Cast-enabled media player and a second Cast-enabled media player (which is the claimed “first zone scene”), and (ii) a representation of a second “speaker group” including the first Cast-enabled media player and a third Cast-enabled media player (which is the claimed “second zone scene”), the Cast-enabled computing device is operable to receive a request from a user to launch the first “speaker group” for synchronous playback, which amounts to the claimed “third request to invoke the first zone scene.” <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/chromecast/answer/6178107?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing receiving a request from a user to launch (and thus “invoke”) the “speaker pair” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the Google Home app:</p>

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Claim 1	Accused Instrumentalities
	<div data-bbox="919 240 1486 751"> </div> <p>Another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s YouTube Music app, which show the Cast-enabled computing device receiving a request from a user to launch (and thus “invoke”) the “speaker pair” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the YouTube Music app:</p>

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Claim 1	Accused Instrumentalities
	<div data-bbox="1075 237 1323 748" data-label="Image"> </div> <p>Yet another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s Google Play Music app, which show the Cast-enabled computing device receiving a request from a user to launch (and thus “invoke”) the “speaker pair” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the Google Play Music app:</p>

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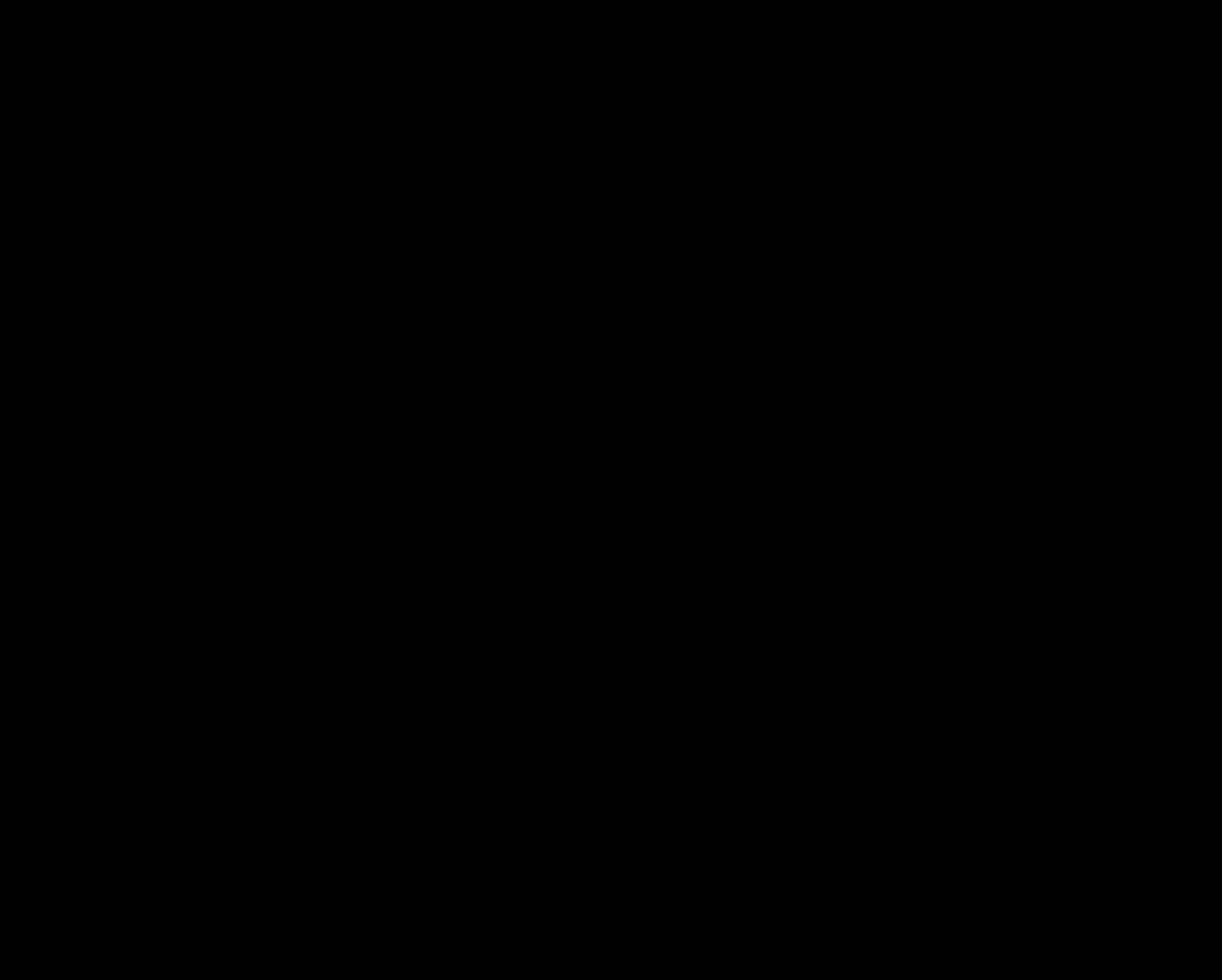
Claim 1	Accused Instrumentalities
	<div data-bbox="1087 240 1333 748" data-label="Image"> </div> <p data-bbox="491 784 1814 820">Various other Cast-enabled apps (e.g., Google Podcasts and Spotify apps) provide similar functionality.</p> <p data-bbox="491 857 1839 927">Representative excerpts of Google's source code for the Google Home app⁵ related to the aforementioned functionality include:</p> <div data-bbox="491 964 1906 1122" data-label="Text"> <pre>[REDACTED]</pre> </div> <ul style="list-style-type: none"> <li data-bbox="541 1159 1562 1276">• [REDACTED]

⁵ [REDACTED]

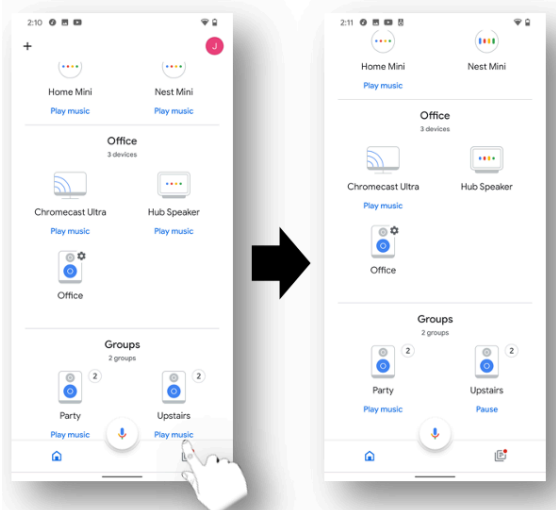
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Claim 1	Accused Instrumentalities
	Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.
<p>[1.11] based on the third request, causing the first zone player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player.</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to, based on the third request, cause the first Cast-enabled media player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player.</p> <p>For instance, each Cast-enabled computing device is programmed such that, based on a request to launch a first “speaker group” (which is the claimed “third request to invoke the first zone scene”), the Cast-enabled computing device sends a “launch” message to the elected leader of the first “speaker group” (which could either be the first Cast-enabled media player or the second Cast-enabled media player) that causes at least the first Cast-enabled media player to transition from (i) operating in a standalone mode in which the first Cast-enabled media player is configured to play back audio individually to (ii) operating in accordance with the previously-saved group defined by the first “speaker group” such that the first Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to output audio in synchrony with the output of audio by the second Cast-enabled media player. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (“Group any combination of Google Nest or Google Home speakers and displays and Chromecast devices together for synchronous music throughout the home.”); GOOG-SONOSWDTX-00048962 [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

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Claim 1	Accused Instrumentalities
	

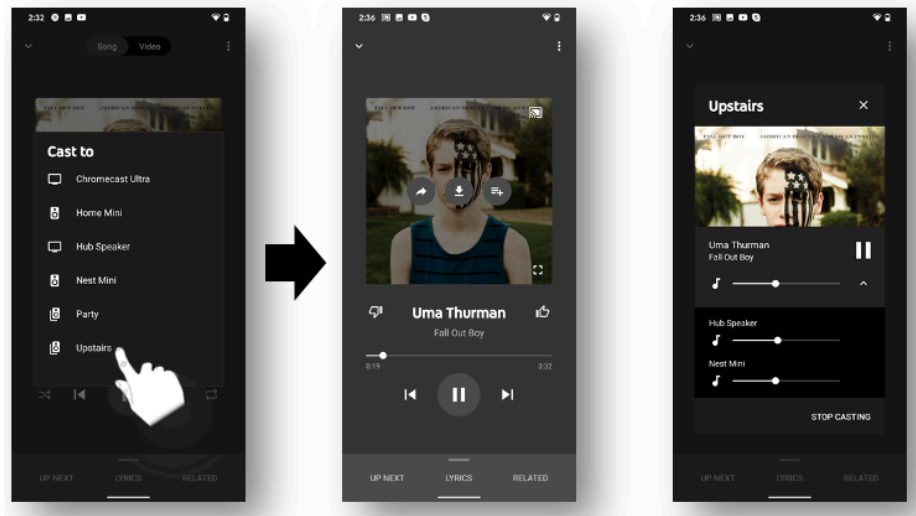
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Claim 1	Accused Instrumentalities
	<p>Two examples of this functionality are illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing device receiving a request from a user to launch the first “speaker group” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the Google Home app and then responsively sending a “launch” message that causes the “Nest Mini” and “Hub Speaker” players to transition from (i) operating in a standalone mode in which each of the “Nest Mini” and “Hub Speaker” players is configured to play back audio individually to (ii) operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” such that the “Nest Mini” and “Hub Speaker” players are configured to coordinate with one another to output audio in synchrony:</p> 

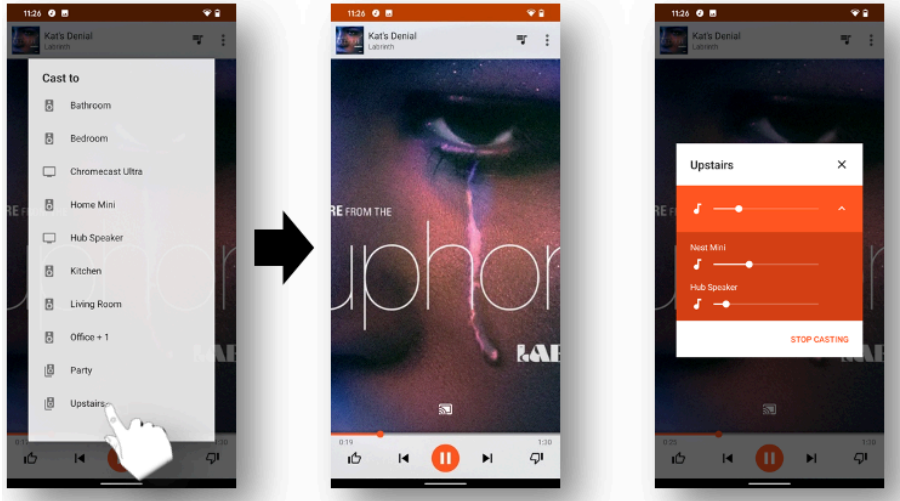
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Claim 1	Accused Instrumentalities
	<div data-bbox="913 235 1501 755"> </div> <p>Another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s YouTube Music app, which show the Cast-enabled computing device receiving a request from a user to launch the first “speaker group” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the YouTube Music app and then responsively sending a “launch” message that causes the “Nest Mini” and “Hub Speaker” players to transition from (i) operating in a standalone mode in which each of the “Nest Mini” and “Hub Speaker” players is configured to play back audio individually to (ii) operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” such that the “Nest Mini” and “Hub Speaker” players are configured to coordinate with one another to output audio in synchrony:</p>

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Claim 1	Accused Instrumentalities
	 <p>The figure consists of three sequential screenshots from the Google Play Music app, connected by a large black arrow pointing from left to right. The first screenshot shows the 'Cast to' menu with a list of devices: Chromecast Ultra, Home Mini, Hub Speaker, Nest Mini, Party, and Upstairs. A hand icon is shown tapping on the 'Upstairs' option. The second screenshot shows the music player interface for 'Uma Thurman - Fall Out Boy', with playback controls and a progress bar. The third screenshot shows the 'Upstairs' speaker group settings, with sliders for 'Hub Speaker' and 'Nest Mini' and a 'STOP CASTING' button at the bottom.</p> <p>Yet another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s Google Play Music app, which show the Cast-enabled computing device receiving a request from a user to launch the first “speaker group” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the Google Play Music app and then responsively sending a “launch” message that causes the “Nest Mini” and “Hub Speaker” players to transition from (i) operating in a standalone mode in which each of the “Nest Mini” and “Hub Speaker” players is configured to play back audio individually to (ii) operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” such that the “Nest Mini” and “Hub Speaker” players are configured to coordinate with one another to output audio in synchrony:</p>

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Claim 1	Accused Instrumentalities
	 <p>Various other Cast-enabled apps (e.g., Google Podcasts and Spotify apps) provide similar functionality.</p> <p>Representative excerpts of Google’s source code for the Google Home app⁶ related to the aforementioned functionality, from the perspective of a Cast-enabled computing device, include:</p> <pre>[REDACTED]</pre> <ul style="list-style-type: none"> • [REDACTED]

⁶ [REDACTED]

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Claim 1	Accused Instrumentalities
	<p>Representative excerpts of Google’s source code related to the aforementioned functionality, from the perspective of a Cast-enabled media player elected as a leader of a “speaker group,” include:</p> <div data-bbox="491 337 1906 836" style="border: 1px solid black; height: 300px; background-color: black; margin: 10px 0;"></div> <ul style="list-style-type: none"> • <div data-bbox="533 868 1906 1391" style="background-color: black; margin: 10px 0; min-height: 250px;"></div>


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Claim 1	Accused Instrumentalities												
	<div data-bbox="535 235 1837 990"> </div> <p data-bbox="489 1023 1793 1096">Representative excerpts of Google’s source code related to the aforementioned functionality, from the perspective of a Cast-enabled media player elected as a follower of a “speaker group,” include:</p> <div data-bbox="489 1128 1906 1396"> <table border="1"> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> </table> </div>												

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Claim 1	Accused Instrumentalities

Ex. C –Infringement Contention Chart: U.S. Patent No. 10,469,966
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Claim 1	Accused Instrumentalities
	 <p data-bbox="489 760 1923 865">Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p>
Claim 2	Accused Instrumentalities
<p data-bbox="201 951 468 1406">[2.0] The computing device of claim 1, further comprising program instructions stored on the non-transitory computer-readable medium that, when executed by the one or more processors, cause the</p>	<p data-bbox="489 951 1923 1089">As described above, each Cast-enabled computing device comprises a “computing device,” as recited in claim 1. Moreover, each Cast-enabled computing device comprises a non-transitory computer-readable medium including executable instructions that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to perform the functions identified below.</p>

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Claim 2	Accused Instrumentalities
computing device to perform functions comprising:	
<p>[2.1] while the first zone player is configured to coordinate with at least the second zone player to play back media in synchrony with at least the second zone player, receiving a fourth request to invoke the second zone scene; and</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to, while the first Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to play back media in synchrony with at least the second Cast-enabled media player, receiving a fourth request to invoke the second zone scene.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while the first Cast-enabled media player is operating in accordance with the previously-saved group defined by the first “speaker group” such that the first Cast-enabled media player is configured to coordinate with the second Cast-enabled media player to output audio in synchrony with the output of audio by the second Cast-enabled media player, the Cast-enabled computing device is operable to receive a request to launch the second “speaker group,” which amounts to the claimed “fourth request to invoke the second zone scene.” <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/chromecast/answer/6178107?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device installed with the Google Home app, which show the Cast-enabled computing receiving a request from a user to launch (and thus “invoke”) the second “speaker group” named “Party” (which is the claimed “second zone scene”) via the GUI of the Google Home app while the “Nest Mini” (the claimed “first zone player”) is configured to output audio in synchrony with the “Hub Speaker” (the claimed “second zone player”) in accordance with the launched first “speaker group” named “Upstairs”:</p>

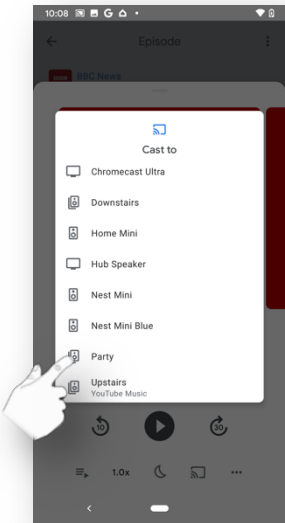
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Claim 2	Accused Instrumentalities
	<div data-bbox="1050 256 1318 782" data-label="Image"> </div> <p>Another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device installed with not only the Google Home app, but also Google’s YouTube Music app, which show the Cast-enabled computing receiving a request from a user to launch (and thus “invoke”) the second “speaker group” named “Party” (which is the claimed “second zone scene”) via the GUI of the YouTube Music app while the “Nest Mini” (the claimed “first zone player”) is configured to output audio in synchrony with the “Hub Speaker” (the claimed “second zone player”) in accordance with the launched first “speaker group” named “Upstairs”:</p>

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Claim 2	Accused Instrumentalities
	<div data-bbox="1033 261 1318 781">  </div> <p data-bbox="489 850 1917 1102">Yet another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device installed with not only the Google Home app, but also Google’s Google Podcasts app, which show the Cast-enabled computing receiving a request from a user to launch (and thus “invoke”) the second “speaker group” named “Party” (which is the claimed “second zone scene”) via the GUI of the Google Podcasts app while the “Nest Mini” (the claimed “first zone player”) is configured to output audio in synchrony with the “Hub Speaker” (the claimed “second zone player”) in accordance with the launched first “speaker group” named “Upstairs”:</p>

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Claim 2	Accused Instrumentalities
	 <p>Various other Cast-enabled apps (e.g., Google Play Music and Spotify apps) provide similar functionality.</p> <p>Representative excerpts of Google's source code related to the aforementioned functionality include the source code cited above in connection with claim limitation 1.10.</p> <p>Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 13, including any of Google's documents or source code cited therein. <i>See</i> Defendant's Objections & Responses to Plaintiff's First Set of Fact Discovery Interrogatories to Defendants.</p>
<p>[2.2] based on the fourth request, causing the first zone player to (a) cease to operate in accordance with the first predefined</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device's non-transitory computer-readable medium that, when executed by the Cast-enabled computing device's one or more processors, cause the Cast-enabled computing device to, based on the fourth request, cause the first Cast-enabled media player to (a) cease to operate in accordance with the first predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is no longer configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player and (b) begin to operate in accordance with the second</p>

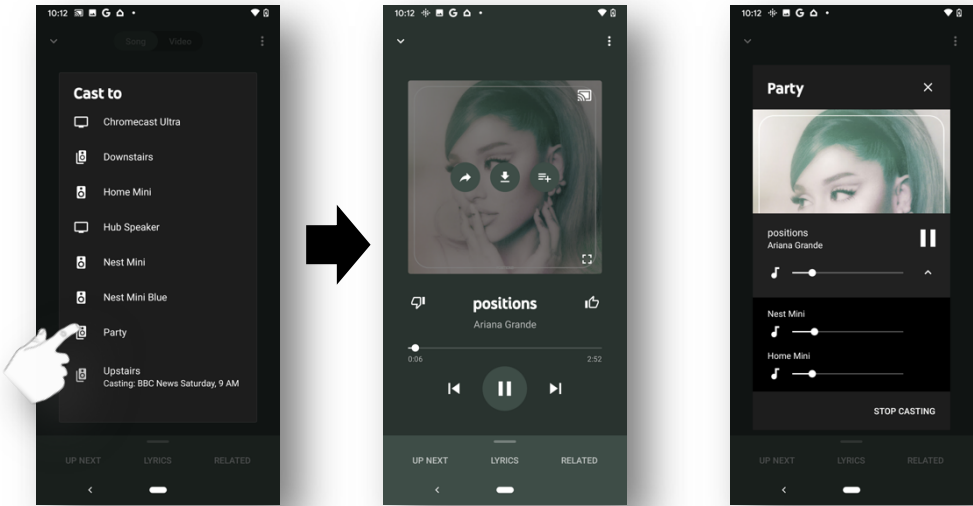
Ex. C –Infringement Contention Chart: U.S. Patent No. 10,469,966
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Claim 2	Accused Instrumentalities
<p>grouping of zone players such that the first zone player is no longer configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player and (b) begin to operate in accordance with the second predefined grouping of zone players such that the first zone player is configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player.</p>	<p>predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player.</p> <p>For instance, each Cast-enabled computing device is programmed such that, based on a request to launch the second “speaker group” (which is the claimed “fourth request to invoke the second zone scene”) while the first Cast-enabled media player is operating in accordance with the previously-saved group defined by the first “speaker group” (which is the claimed “first zone scene”), the Cast-enabled computing device sends a “launch” message to the elected leader of the second “speaker group” (which could either be the first Cast-enabled media player or the third Cast-enabled media player) that causes at least the first Cast-enabled media player to (a) cease to operate in accordance with the previously-saved group defined by the first “speaker group” such that the first Cast-enabled media player is no longer configured to coordinate with at least the second Cast-enabled media player to output audio in synchrony with output of audio by at least the second Cast-enabled media player and (b) begin to operate in accordance with the previously-saved group defined by the second “speaker group” such that the first Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output audio in synchrony with output of audio by at least the third Cast-enabled media player. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (“Group any combination of Google Nest or Google Home speakers and displays and Chromecast devices together for synchronous music throughout the home.”); <i>see also</i> claim limitation 1.11.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing device receiving a request from a user to launch the second “speaker group” named “Party” (which is the claimed “second zone scene”) via the GUI of the Google Home app and then responsively sending a “launch” message that causes the “Nest Mini” player (which is the claimed “first zone player”) to (a) cease operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” and (b) begin operating in accordance with the previously-saved group defined by the “Party” “speaker group” such that the “Nest Mini” player and the “Home Mini” player (the claimed “third zone player”) are configured to coordinate with one another to output audio in synchrony:</p>

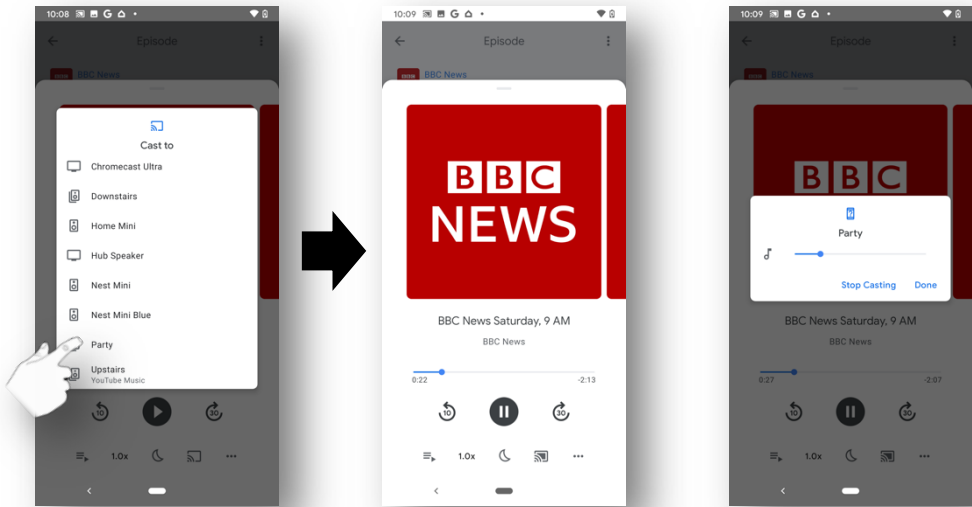
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Claim 2	Accused Instrumentalities
	<div data-bbox="886 258 1470 760" data-label="Image"> <p>The image shows two side-by-side screenshots of a mobile application interface, connected by a large black arrow pointing from left to right. Both screenshots display a 'Groups' section with three groups: 'Downstairs', 'Party', and 'Upstairs'. Each group has a 'Play music' button. In the left screenshot, a hand icon is tapping the 'Play music' button for the 'Party' group. In the right screenshot, the 'Party' group's button is labeled 'Pause', indicating a state change or a different action being performed.</p> </div> <p>Another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s YouTube Music app, which show the Cast-enabled computing device receiving a request from a user to launch the second “speaker group” named “Party” (which is the claimed “second zone scene”) via the GUI of the YouTube Music app and then responsively sending a “launch” message that causes the “Nest Mini” player (which is the claimed “first zone player”) to (a) cease operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” and (b) begin operating in accordance with the previously-saved group defined by the “Party” “speaker group” such that the “Nest Mini” player and the “Home Mini” player (the claimed “third zone player”) are configured to coordinate with one another to output audio in synchrony:</p>

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Claim 2	Accused Instrumentalities
	 <p>The figure consists of three sequential screenshots of a mobile application interface, connected by a large black arrow pointing from left to right. The first screenshot shows a 'Cast to' menu with a list of devices: Chromecast Ultra, Downstairs, Home Mini, Hub Speaker, Nest Mini, Nest Mini Blue, Party, and Upstairs. A hand icon is pointing at the 'Party' option. The second screenshot shows the 'positions' player interface for Ariana Grande, with a progress bar and playback controls. The third screenshot shows the 'Party' player interface, which displays a list of speakers (Nest Mini, Home Mini) with volume sliders and a 'STOP CASTING' button at the bottom.</p> <p>Yet another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s Google Podcasts app, which show the Cast-enabled computing device receiving a request from a user to launch the second “speaker group” named “Party” (which is the claimed “second zone scene”) via the GUI of the Google Podcasts app and then responsively sending a “launch” message that causes the “Nest Mini” player (which is the claimed “first zone player”) to (a) cease operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” and (b) begin operating in accordance with the previously-saved group defined by the “Party” “speaker group” such that the “Nest Mini” player and the “Home Mini” player (the claimed “third zone player”) are configured to coordinate with one another to output audio in synchrony:</p>

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Claim 2	Accused Instrumentalities
	 <p>Various other Cast-enabled apps (e.g., Google Play Music and Spotify apps) provide similar functionality.</p> <p>Representative excerpts of Google’s source code related to the aforementioned functionality include the source code cited for claim limitation 1.11.</p> <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p>
Claim 3	Accused Instrumentalities
<p>[3.0] The computing device of claim 1, [3.1] wherein causing storage of the first zone scene</p>	<p>As described above, each Cast-enabled computing device comprises a “computing device,” as recited in claim 1. Moreover, as described above, each Cast-enabled computing device is programmed to cause storage of the first zone scene by causing storage of the first zone scene at a location other than the Cast-enabled computing device.</p>

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Claim 3	Accused Instrumentalities
<p>comprises causing storage of the first zone scene at a location other than the computing device, and</p>	<p>For instance, as noted above, based on a request from a user to create a first “speaker group” including the first Cast-enabled media player and the second Cast-enabled media player in the Cast-enabled playback system (which is the claimed “first zone scene”), the Cast-enabled computing device generates data that defines the first “speaker group” ([REDACTED])</p> <p>[REDACTED] Thus, by virtue of causing storage of data defining the first “speaker group” (which is the claimed “first zone scene”) at the first and second Cast-enabled media players (which are the claimed “first zone player” and “second zone player”), the Cast-enabled computing device causes “storage of the first zone scene at a location other than the [Cast-enabled] computing device.” <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups”); <i>see also</i> limitation 1.6.</p> <p>Notably, this functionality of causing storage of data defining the first “speaker group” at the first and second Cast-enabled media players enables other Cast-enabled computing devices and Cast-enabled displays to display the first “speaker group” as an available option for playback regardless of whether the Cast-enabled computing device or Cast-enabled display was used to create the “speaker group” (and in fact, regardless of whether the Cast-enabled computing device or Cast-enabled display was even powered up or connected to the Cast-enabled playback system at the time that the “speaker group” was created).</p> <p>Representative excerpts of Google’s source code related to the aforementioned functionality include the source code cited for claim limitation 1.6.</p> <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p>
<p>[3.2] wherein causing storage of the second zone scene comprises causing storage of</p>	<p>As described above, each Cast-enabled computing device is programmed to cause storage of the second zone scene by causing storage of the second zone scene at the location other than the Cast-enabled computing device.</p>

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Claim 3	Accused Instrumentalities
<p>the second zone scene at the location other than the computing device.</p>	<p>For instance, based on a request from a user to create a second “speaker group” including the first Cast-enabled media player and the third Cast-enabled media player in the Cast-enabled playback system (which is the claimed “second zone scene”), the Cast-enabled computing device generates data that defines the second “speaker group” ([REDACTED]). Thus, by virtue of causing storage of data defining the second “speaker group” (which is the claimed “second zone scene”) at the first and third Cast-enabled media players (which are the claimed “first zone player” and “third zone player”), the Cast-enabled computing device causes “storage of the second zone scene at a location other than the [Cast-enabled] computing device.” <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups”); <i>see also</i> limitation 1.8.</p> <p>As noted above, this functionality of causing storage of data defining the second “speaker group” at the first and third Cast-enabled media players enables other Cast-enabled computing devices and Cast-enabled displays to display the second “speaker group” as an available option for playback regardless of whether the Cast-enabled computing device or Cast-enabled display was used to create the “speaker group” (and in fact, regardless of whether the Cast-enabled computing device or Cast-enabled display was even powered up or connected to the Cast-enabled playback system at the time that the “speaker group” was created).</p> <p>Representative excerpts of Google’s source code related to the aforementioned functionality include the source code cited for claim limitation 1.6.</p> <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p>
Claim 4	Accused Instrumentalities
<p>[4.0] The computing device of claim 3, [4.1]</p>	<p>As described above, each Cast-enabled computing device comprises a “computing device,” as recited in claim 3. Moreover, each Cast-enabled computing device is programmed to cause storage of the first and second zone</p>

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Claim 4	Accused Instrumentalities
wherein the location other than the computing device comprises a zone player of the first predefined grouping of zone players.	scenes by causing storage of the first and second zone scenes at a Cast-enabled media player that is included in the previously-saved groups defined by the first and second zone scenes. <i>See</i> claim 3.

Claim 6	Accused Instrumentalities
[6.0] The computing device of claim 1, [6.1] wherein the first predefined grouping of zone players does not include the third zone player, and [6.2] wherein the second predefined grouping of zone players does not include the second zone player.	As described above, each Cast-enabled computing device comprises a “computing device,” as recited in claim 1. Moreover, each Cast-enabled computing device is programmed such that, in enabling and causing creation of a first “speaker group” that includes a first Cast-enabled media player and a second Cast-enabled media player (which is the claimed “first zone scene” comprising the “first predefined grouping of zone players”) and a second “speaker group” that includes the first Cast-enabled media player and a third Cast-enabled media player (which is the claimed “second zone scene” comprising the “second predefined grouping of zone players”), the first “speaker group” need not include the third Cast-enabled media player (which is the claimed “third zone player”) and the second “speaker group” need not include the second Cast-enabled media player (which is the claimed “second zone player”). <i>See</i> claim limitations 1.5 and 1.7.

Claim 8	Accused Instrumentalities
[8.0] The computing device of claim 1, [8.1] wherein receiving	As described above, each Cast-enabled computing device comprises a “computing device,” as recited in claim 1. Moreover, as described above, each Cast-enabled computing device is programmed to receive a first request to create a first zone scene that takes the form of a first set of one or more inputs received via a user interface of the Cast-enabled computing device.

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Claim 8	Accused Instrumentalities
the first request comprises receiving a first set of one or more inputs via a user interface of the computing device,	For instance, as discussed and shown above in connection with claim limitation 1.5, each Cast-enabled computing device is programmed to receive a request from a user to create a first “speaker group” (which amounts to the claimed “first request to create a first zone scene”) that takes the form of a set of one or more inputs received via a GUI of the Google Home app running on the Cast-enabled computing device.
[8.2] wherein receiving the second request comprises receiving a second set of one or more inputs via the user interface, and	As described above, each Cast-enabled computing device is programmed to receive a second request to create a second zone scene that takes the form of a second set of one or more inputs received via the user interface. For instance, as discussed and shown above in connection with claim limitation 1.7, each Cast-enabled computing device is programmed to receive a request from a user to create a second “speaker group” (which amounts to the claimed “second request to create a second zone scene”) that takes the form of a set of one or more inputs received via the GUI of the Google Home app running on the Cast-enabled computing device.
[8.3] wherein receiving the third request comprises receiving a third set of one or more inputs via the user interface.	As described above, each Cast-enabled computing device is programmed to receive a third request to invoke the first zone scene that takes the form of a third set of one or more inputs received via the user interface. For instance, as discussed and shown above in connection with claim limitation 1.10, each Cast-enabled computing device is programmed to receive a request from a user to launch the first “speaker group” (which amounts to the claimed “third request to invoke the first zone scene”) that takes the form of a set of one or more inputs received via the GUI of the Google Home app running on the Cast-enabled computing device.
Claim 9	Accused Instrumentalities
[9.0] A non-transitory computer-readable medium, wherein the non-transitory computer-readable medium is provisioned with program	Google’s “Cast” technology enables Cast-enabled media players to be included in a “speaker group” “for synchronous music throughout the home.” These Cast-enabled media players include Google’s own Cast-enabled media players, such as the Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Wifi Point, Chromecast, Chromecast Audio, Chromecast Ultra, Chromecast with Google TV, and Nest Audio media players, as well as various other third-party media players with built-in Cast functionality. See, e.g., https://store.google.com/us/product/google_home_max?hl=en-US ; https://store.google.com/us/product/chromecast_google_tv_compare?hl=en-US ; https://www.google.com/chromecast/built-in/audio/ .

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Claim 9	Accused Instrumentalities
instructions that are executable to cause a computing device to perform functions comprising:	<p>To facilitate this functionality, the Google Home app allows a user to “[c]reate and manage speaker groups” from the user’s smartphone, tablet, or computer device, as well as to “cast” to a previously-created “speaker group” from the user’s smartphone, tablet, or computer device, which would cause the “speaker group” to be invoked. https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en. In addition, there are many other Cast-enabled Android, iOS, Chrome, or browser-based apps that allow a user to “cast” to a previously-created “speaker group” (and thereby cause the “speaker group” to be launched) using the user’s smartphone, tablet, or computer device, including certain of Google’s own Cast-enabled apps (e.g., YouTube Music app, the Google Play Music app, the Google Podcasts app, etc.) as well as certain third-party Cast-enabled apps (e.g., the Spotify app), accessed via an app store or Chromecast-enabled site URL. The Google Home app, either alone or together with one or more of these other Cast-enabled apps, can be installed and run on any smartphone, tablet, or computer device that supports Android, iOS, Chrome, or browser-based apps, including Google’s own “Pixel” smartphone, tablet, and computer devices (e.g., the Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL, Pixel 4a, Pixel 4a (5G), Pixel 5, Pixel 5a (5G), Pixel 6 phones, the Pixel Slate tablet, and the Pixelbook and Pixelbook Go laptops) as well as many third-party smartphone, tablet, or computer device. See, e.g., https://store.google.com/us/magazine/compare_pixel; https://store.google.com/us/product/google_pixelbook_specs; https://store.google.com/us/product/pixel_slate_specs. For purposes of this chart, any smartphone, tablet, or computer device installed with the Google Home app, either alone or together with one or more of these other Cast-enabled apps, will be referred to as a “Cast-enabled computing device.”</p> <p>As set out in the Supplemental Infringement Contentions, Sonos has endeavored to list the possible third-party smartphone, tablet, and computer devices that may have been used to download and install the Google Home app between November 2019 to present. See Appx. 1. Each of these third-party smartphone, tablet, and computer devices, when installed with the Google Home app, meets all elements of the claims as explained in more detail herein. As set forth below, Sonos cites representative examples of Google smartphone, tablet, and computer devices that comprises a tangible, non-transitory computer-readable storage medium that, when installed with the Google Home app, includes executable instructions that when executed by a processor causes the device to carry out the recited functions, but notes that a tangible, non-transitory computer-readable storage medium has become ubiquitous among all smartphone, tablet, and computer devices. Each possible third-party smartphone, tablet, and computer device listed in Appendix 1 contains this aspect and thus meets this element.</p>

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Claim 9	Accused Instrumentalities
	<p>Certain of the aforementioned Cast-enabled media players also include a display screen and software that enables these Cast-enabled media players to additionally function as a control device for other Cast-enabled media players. This sub-category of Cast-enabled media players, which will be referred to herein as “Cast-enabled displays,” includes Google’s Home Hub, Nest Hub, and Nest Hub Max media players. <i>See, e.g.,</i> https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music; https://store.google.com/us/product/google_nest_hub_max?hl=en-US; https://support.google.com/googlenest/answer/9165738?hl=en-GB&ref_topic=7030084. Similar to the Cast-enabled apps installed on the Cast-enabled computing devices, the software installed on these Cast-enabled displays allows a user to “cast” to a previously-created “speaker group” using the Cast-enabled display’s user interface.</p> <p>As described in further detail, each Cast-enabled computing device is a “controller” that comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled computing device’s processor, cause the Cast-enabled computing device to perform the functions recited in claim 9. Further, each server that hosts the Google Home app for download onto Cast-enabled computing devices, which is referred to herein as a “Cast-enabled app download server,” comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device’s processor, cause the Cast-enabled computing device to perform the functions recited in claim 9. Further yet, because each Cast-enabled media player is a data network device (<i>i.e.</i>, a device that is configured to connect to and communicate over a medium that interconnects devices in a manner that enables them to send digital data packets to and receive digital data packets from each other) and is configured to process and output audio, each Cast-enabled media player comprises a “zone player” as recited in claim 9. <i>See, e.g.,</i> Pl.’s Opening Markman Br. (D.I. 60 of 20-cv-881-ADA) at pp. 4-6, 23-26, Exs. 24-25 ; Pl.’s Reply Markman Br. (D.I. 66 of 20-cv-881-ADA) at pp. 2-3, 10-12, Exs. 26-27; SONOS-SVG2-00018184 - SONOS-SVG2-00018236 [ITC Order No. 20] at p. 15; https://support.google.com/googlenest/answer/7072284?hl=en; https://support.google.com/chromecast/answer/3046409?hl=en; https://store.google.com/us/product/nest_wifi_specs?hl=en-US.</p>
[9.1] while serving as a controller for a networked media playback system comprising a first	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device’s processor, cause the Cast-enabled computing device to, while serving as a controller for a Cast-enabled playback system comprising a first Cast-enabled media player and at least two other Cast-enabled media players, where the first Cast-enabled media player is operating in a standalone mode in which the first

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Claim 9	Accused Instrumentalities
zone player and at least two other zone players, wherein the first zone player is operating in a standalone mode in which the first zone player is configured to play back media individually:	Cast-enabled media player is configured to play back media individually, perform the functions identified below. <i>See</i> claim limitation 1.4.
[9.2] receiving a first request to create a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked;	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to receive a first request to create a first zone scene comprising a first predefined grouping of Cast-enabled media players including at least the first Cast-enabled media player and a second Cast-enabled media player that are to be configured for synchronous playback of media when the first zone scene is invoked. <i>See</i> claim limitation 1.5.
[9.3] based on the first request, i) causing creation of the first zone scene, ii) causing an indication of the first zone scene to	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, based on the first request, (i) cause creation of the first zone scene, (ii) cause an indication of the first zone scene to be transmitted to the first Cast-enabled media player, and (iii) cause storage of the first zone scene. <i>See</i> claim limitation 1.6.

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Claim 9	Accused Instrumentalities
be transmitted to the first zone player, and iii) causing storage of the first zone scene;	
[9.4] receiving a second request to create a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the third zone player is different than the second zone player;	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to receive a second request to create a second zone scene comprising a second predefined grouping of Cast-enabled media players including at least the first Cast-enabled media player and a third Cast-enabled media player that are to be configured for synchronous playback of media when the second zone scene is invoked, where the third Cast-enabled media player is different than the second Cast-enabled media player. <i>See</i> claim limitation 1.7.
[9.5] based on the second request, i) causing creation of the second zone scene, ii) causing an indication of the	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, based on the second request, (i) cause creation of the second zone scene, (ii) cause an indication of the second zone scene to be transmitted to the first Cast-enabled media player, and (iii) cause storage of the second zone scene. <i>See</i> claim limitation 1.8.

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Claim 9	Accused Instrumentalities
second zone scene to be transmitted to the first zone player, and iii) causing storage of the second zone scene;	
[9.6] displaying a representation of the first zone scene and a representation of the second zone scene; and	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to display a representation of the first zone scene and a representation of the second zone scene. <i>See</i> claim limitation 1.9.
[9.7] while displaying the representation of the first zone scene and the representation of the second zone scene, receiving a third request to invoke the first zone scene; and	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, while displaying the representation of the first zone scene and the representation of the second zone scene, receive a third request to invoke the first zone scene. <i>See</i> claim limitation 1.10.
[9.8] based on the third request, causing the first zone player to transition from operating in the standalone mode to operating in	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, based on the third request, cause the first Cast-enabled media player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player. <i>See</i> claim limitation 1.11.

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Claim 9	Accused Instrumentalities
<p>accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player.</p>	
Claim 10	Accused Instrumentalities
<p>[10.0] The non-transitory computer-readable medium of claim 9, wherein the non-transitory computer-readable medium is also provisioned with program instructions stored on the non-transitory computer-readable medium that, when executed by the one</p>	<p>As described above, each Cast-enabled computing device and each Cast-enabled app download server comprises a “non-transitory computer-readable medium,” as recited in claim 9. Moreover, in accordance with the program instructions, each Cast-enabled computing device comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled computing device, cause the Cast-enabled computing device to perform the functions identified below. <i>See</i> claim limitation 2.0.</p>

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Claim 10	Accused Instrumentalities
or more processors, cause the computing device to perform functions comprising:	
[10.1] while the first zone player is configured to coordinate with at least the second zone player to play back media in synchrony with at least the second zone player, receiving a fourth request to invoke the second zone scene; and	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, while the first Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to play back media in synchrony with at least the second Cast-enabled media player, receive a fourth request to invoke the second zone scene. <i>See</i> claim limitation 2.1.
[10.2] based on the fourth request, causing the first zone player to (a) cease to operate in accordance with the first predefined grouping of zone players such that the first zone player is no longer configured to	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, based on the fourth request, cause the first Cast-enabled media player to (a) cease to operate in accordance with the first predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is no longer configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player and (b) begin to operate in accordance with the second predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player. <i>See</i> claim limitation 2.2.

Ex. C –Infringement Contention Chart: U.S. Patent No. 10,469,966
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Claim 10	Accused Instrumentalities
coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player and (b) begin to operate in accordance with the second predefined grouping of zone players such that the first zone player is configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player.	
Claim 11	Accused Instrumentalities
[11.0] The non-transitory computer-readable medium of claim 9, [11.1] wherein causing storage of the first zone scene	As described above, each Cast-enabled computing device and each Cast-enabled app download server comprises a “non-transitory computer-readable medium,” as recited in claim 9. Moreover, in accordance with the program instructions, each Cast-enabled computing device is programmed to cause storage of the first zone scene by causing storage of the first zone scene at a location other than the Cast-enabled computing device. <i>See</i> claim limitation 3.1.

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Claim 11	Accused Instrumentalities
comprises causing storage of the first zone scene at a location other than the computing device, and	
[11.2] wherein causing storage of the second zone scene comprises causing storage of the second zone scene at the location other than the computing device.	In accordance with the program instructions, each Cast-enabled computing device is programmed to cause storage of the second zone scene by causing storage of the second zone scene at the location other than the Cast-enabled computing device. <i>See</i> claim limitation 3.2.

Claim 12	Accused Instrumentalities
[12.0] The non-transitory computer-readable medium of claim 11, [12.1] wherein the location other than the computing device comprises a zone player of the first predefined grouping of zone players.	As described above, each Cast-enabled computing device and each Cast-enabled app download server comprises a “non-transitory computer-readable medium,” as recited in claim 11. Moreover, in accordance with the program instructions, each Cast-enabled computing device is programmed to cause storage of the first and second zone scenes by causing storage of the first and second zone scenes at the first Cast-enabled media player that is included in the previously-saved groups defined by the first and second zone scenes. <i>See</i> claim 4.

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Claim 14	Accused Instrumentalities
<p>[14.0] The non-transitory computer-readable medium of claim 9, [14.1] wherein the first predefined grouping of zone players does not include the third zone player, and [14.2] wherein the second predefined grouping of zone players does not include the second zone player.</p>	<p>As described above, each Cast-enabled computing device and each Cast-enabled app download server comprises a “non-transitory computer-readable medium,” as recited in claim 9. Moreover, in accordance with the program instructions, each Cast-enabled computing device is programmed such that, in enabling and causing creation of a first “speaker group” that includes a first Cast-enabled media player and a second Cast-enabled media player (which is the claimed “first zone scene” comprising the “first predefined grouping of zone players”) and a second “speaker group” that includes the first Cast-enabled media player and a third Cast-enabled media player (which is the claimed “second zone scene” comprising the “second predefined grouping of zone players”), the first “speaker group” need not include the third Cast-enabled media player (which is the claimed “third zone player”) and the second “speaker group” need not include the second Cast-enabled media player (which is the claimed “second zone player”). <i>See</i> claim limitations 6.0-6.2.</p>

Claim 16	Accused Instrumentalities
<p>[16.0] The non-transitory computer-readable medium of claim 9, [16.1] wherein receiving the first request comprises receiving a first set of one or more inputs via a user interface of the computing device,</p>	<p>As described above, each Cast-enabled computing device and each Cast-enabled app download server comprises a “non-transitory computer-readable medium,” as recited in claim 9. Moreover, in accordance with the program instructions, each Cast-enabled computing device is programmed to receive a first request to create a first zone scene that takes the form of a first set of one or more inputs received via a user interface of the Cast-enabled computing device. <i>See</i> claim limitation 8.1.</p>

Ex. C –Infringement Contention Chart: U.S. Patent No. 10,469,966
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Claim 16	Accused Instrumentalities
[16.2] wherein receiving the second request comprises receiving a second set of one or more inputs via the user interface, and	In accordance with the program instructions, each Cast-enabled computing device is programmed to receive a second request to create a second zone scene that takes the form of a second set of one or more inputs received via the user interface. <i>See</i> claim limitation 8.2.
[16.3] wherein receiving the third request comprises receiving a third set of one or more inputs via the user interface.	In accordance with the program instructions, each Cast-enabled computing device is programmed to receive a third request to invoke the first zone scene that takes the form of a third set of one or more inputs received via the user interface. <i>See</i> claim limitation 8.3.